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2 A Limited Liability Partnership
3 Including Professional Corporations
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7 Attorneys for Lucy Gao (erroneously sued
herein as "Lucy Gao, aka Xiang Xin Gao")
8 and HK Grace Building LLC

9
10 UNITED STATES DISTRICT COURT
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12 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

13 JD BROTHERS LLC, a California Limited
14 Liability Company; WEI "WENDY"
15 HUANG, an individual; and WEI
"WENDY" HUANG as TRUSTEE of the
GUO/HUANG FAMILY TRUST, a
California trust,

16 Plaintiffs,

17 v.

18 LIBERTY ASSET MANAGEMENT
19 CORPORATION; BENJAMIN KIRK, aka
BENNY KO, aka TZU PING KO; LUCY
20 GAO, aka XIANG XIN GAO; SUNSHINE
VALLEY LLC; HK GRACE BUILDING
LLC; and DOES 1-20,

21 Defendants.

22 Case No. 3:15-cv-01373-VC

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24 **STIPULATION AND [PROPOSED]
25 ORDER TO EXTEND TIME TO
26 RESPOND TO AMENDED
27 COMPLAINT**

28 Judge: Hon. Vince Chhabria
Crtrm.: 4, 17th Floor

RECITALS

WHEREAS, on March 25, 2015, Plaintiff JD Brothers LLC (“JD Brothers”) filed its complaint in this action, in response to which Defendants timely filed motions to dismiss, which were fully briefed and set for hearing on July 17, 2015;

WHEREAS, the law firm of Cotchett, Pitre & McCarthy LLP was retained by JD Brothers after it had filed its opposition to the motions to dismiss and, on June 15, 2015, the firm filed an Association of Counsel and Notices of Appearances for Joseph W. Cotchett and Nancy L. Fineman;

9 WHEREAS, the parties stipulated and the Court entered an Order on June 26, 2015
10 to (1) take off calendar the then-pending motions to dismiss, (2) permit JD Brothers to file
11 an amended complaint, and (3) set August 31, 2015 as Defendants' deadline to respond to
12 the amended complaint;

WHEREAS, JD Brothers filed its amended complaint on July 27, 2015, which added new parties as Plaintiffs and dismissed certain parties as Defendants;

15 WHEREAS, on August 11, 2015 the Court entered an Order permitting then-
16 counsel for Defendants Benny Ko, Liberty Asset Management Corporation, and Sunshine
17 Valley LLC (the “Ko Defendants”) to withdraw from the action, and such counsel did
18 withdraw;

19 WHEREAS, the Ko Defendants retained the law firm of Robinson & Wood, Inc.,
20 and Jesse F. Ruiz filed a Notice of Appearance as attorney of record in this action for the
21 Ko Defendants on August 13, 2015;

WHEREAS, prior to and during the telephonic case management conference held on August 18, 2015, and in subsequent communications, counsel for the parties agreed in the interests of efficiency and economy to extend Defendants' deadline to respond to the amended complaint;

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1 **NOW, THEREFORE, IT IS HEREBY AGREED AND STIPULATED**, by and
2 among all parties, through their undersigned counsel of record, and subject to approval of
3 this Court that:

4 1. The deadline for all Defendants to respond to Plaintiffs' amended complaint
5 is continued from August 31, 2015 to September 21, 2015;

6 2. Plaintiffs' opposition to any motion(s) to dismiss the amended complaint
7 must be filed by October 13, 2015;

8 3. Defendants' reply in support of any motion(s) to dismiss the amended
9 complaint must be filed by October 20, 2015; and

10 4. The hearing on any motion(s) to dismiss the amended complaint is set for
11 November 19, 2015.

IT IS SO STIPULATED.

13 | Dated: August 27, 2015

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By _____ /s/ *Anthony N. Moshirnia*
ANTHONY N. MOSHIRNIA

Attorneys for Lucy Gao (erroneously sued herein as “Lucy Gao, aka Xiang Xin Gao”) and HK Grace Building LLC

20 | Dated: August 27, 2015

COTCHETT PITRE & McCARTHY LLP

By _____ */s/ Nancy L. Fineman*
NANCY L. FINEMAN

Attorneys for JD Brothers LLC, Wei "Wendy" Huang, and the Guo/Huang Family Trust

1 Dated: August 27, 2015

2 ROBINSON & WOOD INC.

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4 By _____ */s/ Jesse F. Ruiz*
5 JESSE F. RUIZ

6 Attorneys for Benny Ko, Liberty Asset
7 Management Corporation, and Sunshine Valley
8 LLC

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1 **[PROPOSED] ORDER**

2 PURSUANT TO STIPULATION OF THE PARTIES AND GOOD CAUSE

3 APPEARING:

4 1. The deadline for all Defendants to respond to Plaintiffs' amended complaint
5 is continued from August 31, 2015 to September 21, 2015;

6 2. Plaintiffs' opposition to any motion(s) to dismiss the amended complaint
7 must be filed by October 13, 2015;

8 3. Defendants' reply in support of any motion(s) to dismiss the amended
9 complaint must be filed by October 20, 2015; and

10 4. The hearing on any motion(s) to dismiss the amended complaint is set for
11 November 19, 2015.

12 **IT IS SO ORDERED.**

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14 DATED: August 28, 2015

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17 VINCE CHHABRIA
18 UNITED STATES DISTRICT JUDGE

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